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10 Tina L Clark

6           UNITED STATES BANKRUPTCY COURT  
7 EASTERN DISTRICT COURT OF CALIFORNIA

8           In re:  
9           Tina L Clark  
10           Debtor(s).

Case No: 15-22547  
Chapter: 13  
DCN: BLG-7

11           **STIPULATED EX PARTE MOTION TO ALLOW  
12 MODIFICATION OF DEBTORS' CHAPTER 13 PLAN  
PURSUANT TO LBR 3015-1(d)(3)**

13 The Debtor and David P Cusick, Standing Chapter 13 Trustee, jointly move to modify the plan to move Nationstar  
14 Mortgage LLC (for 1<sup>st</sup> DOT) from Class 4 to Class 3 and to adjust the percentage to unsecured.

- 15       1. Nationstar Mortgage, LLC filed a Motion for Relief from Stay on 11/26/19 (DN 170), which was granted on  
16       1/11/20 (DN 190). Based on this Nationstar Mortgage, LLC (for 1<sup>st</sup> DOT), which is currently being treated  
17       as a Class 4, shall be treated as Class 3, to be surrendered.
- 18       2. Debtor's percentage to unsecured in Section 2.15 of her confirmed First Modified Plan (DN 74) was listed at  
19       0%, but the Trustee later changed that as a result of an audit. The percentage to unsecured should be 50%
- 20       3. All other terms of Debtor's recently confirmed Fourth Modified Plan shall be remain the same
- 21       4. Notice to the creditors is not deemed necessary, as the modification made herein will not have a negative  
22       impact on the treatment of their claims.

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1 IT IS HEREBY STIPULATED that Nationstar Mortgage, LLC (for 1<sup>st</sup> DOT) shall be treated as a Class 3 and that  
2 the percentage to unsecured shall be 50%

3 DATED: 2/21/20

4 By: /s/Chad M Johnson  
5 Chad M Johnson, Esq.  
6 Attorney for the Debtors

7 DATED: 3/17/2020

8 By:   
9 Kristen Koo, Attorney for  
10 David P Cusick, Chapter 13 Trustee

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